## Building the future

A REVIEW OF 2019-2024 EU POLICIES AFFECTING THE BUILT ENVIRONMENT

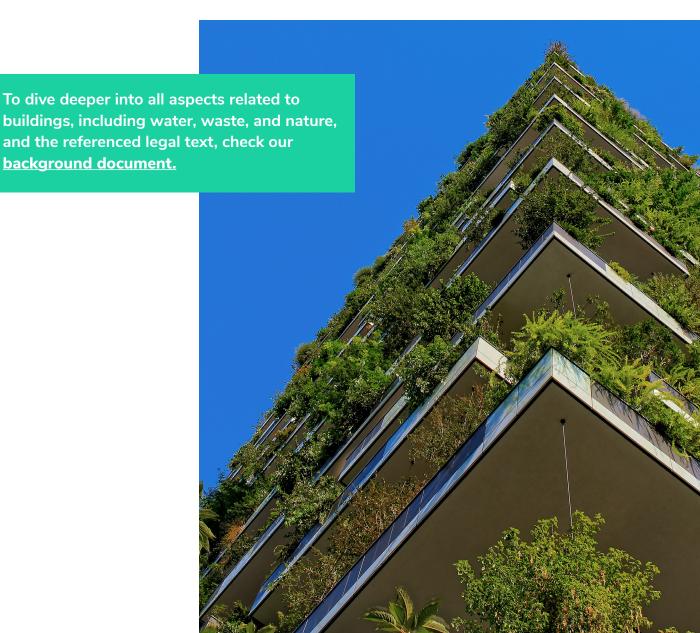




#### Introduction

Addressing the building sector's enormous environmental impacts is crucial to achieving the EU's energy, climate, and material efficiency goals. Annually, buildings account for nearly half of the bloc's energy consumption, one-third of emissions, half of all extracted materials, and a third of waste  $^{12}$ .

EU law affects the future of buildings in the domains of energy, construction materials, and social aspects. This briefing looks at policy measures agreed during the 2019-2024 policy cycle; lessons from their implementation will inform additional actions to ensure that the EU stays aligned with its commitments and planetary necessity.



### Reducing energy use: the Energy Performance of Buildings Directive

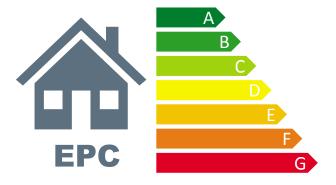
Buildings in the EU – private residences, public buildings, office towers, or commercial blocks – are the top users of energy in the EU (see Figure 1 below). In 2021, the European Environment Agency (EEA) reported that energy-related emissions from buildings in the EU 27 accounted for 1 Gt of CO2-equivalent  $^3$ , roughly one-third of total GHG emissions at EU 27 level for the same year  $^4$ .

The central law to reduce energy use in buildings has been the Energy Performance of Buildings Directive (EPBD), created in 2002 and updated in 2010 and 2024. Its most well-known aspect is arguably the Energy Performance Certificate (EPC) (Art. 19), an information tool conveying energy-related aspects of a building (see Figure 2).



- GHG emissions related to energy use in buildings (2021)
- Other GHG emissions EU-27 (2021)

**Figure 1:** Greenhouse gas emissions linked to energy use in buildings. (Source: EEA, 2021)



**Figure 2:** Colour coding usually adopted in Energy Performance Certificates. The A-G scale is mandated in the EPBD 2024 recast and few exemptions are allowed.

The EPBD's most recent revision combines several mechanisms (detailed below) towards the EU's ambitious yet necessary environmental goal of a zero-emitting building stock by 2050  $^{\rm 5}$ .



## Establishing overall trajectories to reduce energy demand

The EPBD aims at reducing overall energy consumption by 16% by 2030. Later intermediate reduction targets are left to the Member States' implementation plans (Art. 9, a see section 1.3). Importantly, there is no specific energy reduction target for 2050. This means that - despite misinformation - heating, cooling, lighting, and cooking will not be phased out. The 2050 target is only for a zero emitting building stock.

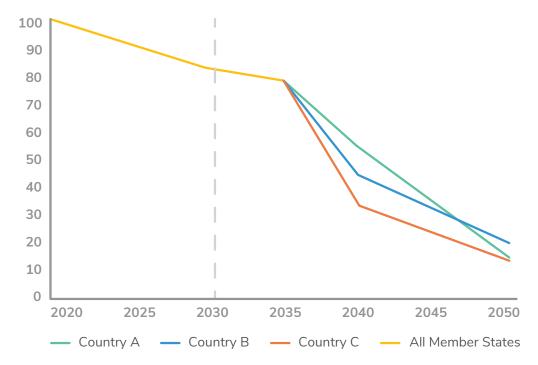


Figure 3: EPBD-mandated and future hypothetical trajectories for energy demand reduction

## Setting stringent requirements for new buildings

As of 2030, new buildings (and new public buildings as of 2028) in the EU must be zero-emission buildings (Art. 7(1)), i.e. buildings of high energy efficiency and without installing fossil fuel-based boilers (Art. 2(2)).



## Focusing on renovating the worst-performing buildings first

Many existing buildings are energy inefficient. The EPBD recognises that accelerating renovation of the worst-performing buildings will lead to the highest energy savings.

#### The EPBD requires different approaches for non-residential and residential buildings:

- For non-residential buildings: Renovating the 16% worst-performing non-residential buildings by 2030 towards better energy classes (Art. 9(1)) with more stringent targets set for later dates.
- For residential buildings: Renovating residential buildings to decrease energy use by 16% by 2030 and more by later dates. 55% of this reduction is to be achieved by renovating the building stock belonging to the 43% less performant (Art. 9(2)) (see Figure 4).

The EPBD does not oblige individual owners to renovate; it obliges Member States to reach an overall reduction in energy use.



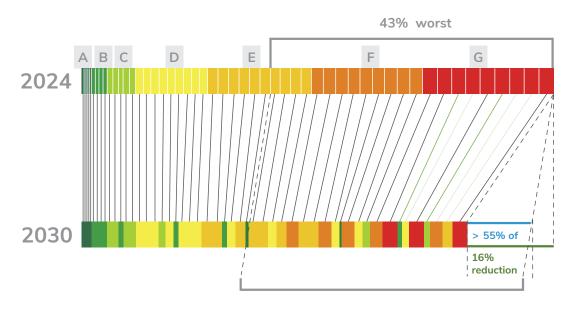


Figure 4: Schematic depiction of the approach for residential buildings according to the recast EPBD

## **Obliging Member States** to provide binding plans

The EPBD is a Directive, which means it requires national transposition, but it sets minimum requirements for all Member States. It gives national governments flexibility on how to reach the targets, but requires National Building Renovation Plans (NBRPs) to be checked and approved by the European Commission (Art. 3, Annex II). NBRPs are required to ensure that

renovation is maximised to meet the committed reduction in energy demand and GHG emissions. To this end, the NBRPs must address the batch of measures with commitments, national minimum requirements, budgetary, and administrative resources as well as financing mechanisms (Art. 3(5)).

## Preventing potential social harm from renovation requirements

Energy renovation costs in the short run, but saves money in the long run. Critics of the EPBD have emphasised the former without acknowledging its mechanisms for directing finance to those in need, or simply the fact that the EPBD does not set individual renovation obligations (see section 1.3).

How will the EPBD address vulnerable households and energy poverty?

The EPBD recognises energy poverty and vulnerable households (Art. 2 (27), (28)), and obliges Member States to take the following measures to support their transition (Art. 17)

• Provide financing and support measures to address up-front costs (paragraphs 1, 3, 7, and 9);

- Use EU revenues from carbon pricing for Member States' renovation activities (paragraph 6);
- Direct financial measures preferentially to vulnerable households (paragraph 18);
- Avoid steep rent increases after renovation and provide support (paragraphs 17 and 19);
- Simplify administrative processes for permitting and financing (paragraph 8);
- Training the necessary workforce (paragraph 12).



### Putting an end to financial support for fossil fuel boilers

With only twenty-five years before the zero-emission target in 2050, the EU should stop installing fossil-fuel-based boilers. Yet, as opposed to the stringent requirements for new houses (section 1.2), the EPBD only bans financial incentives for stand-alone fossil-fuel boilers (Art. 17 (15)), and does not ban new installations.



#### Considering embodied greenhouse gas emissions

The earlier versions of the EPBD were restricted to direct building emissions. In contrast, the new EPBD considers 'lifecycle global warming potential (GWP)' (Art. 2 (24 and 25)), which includes emissions from

energy use as well as from all other lifecycle stages (see Figure 5). Lifecycle GWP must be disclosed as of 2030 for all new buildings, and Member States must gradually set decreasing maximum values (Art. 7 (2) and (5)).

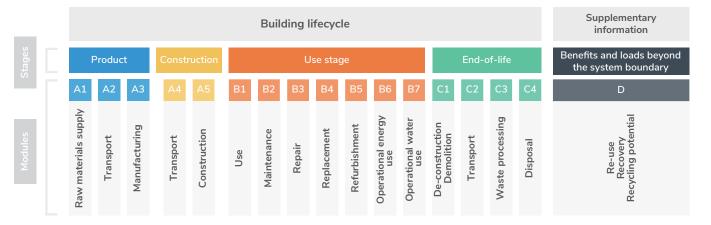


Figure 5: Schematic depiction of the lifecycle stages leading to GHG emissions in buildings (EN 15978)

## Promoting bikes, electric vehicles, and on-site renewable energy production

The EPBD sets additional standards to make new constructions easier to use and more sustainable, by mandating bicycle racks and electric charging stations (or pre-cabling) in many non-residential and residential

buildings (Art. 14) <sup>b</sup>. Solar panels are to be installed in many new buildings or upon major renovation (Art. 10) <sup>c</sup>.

## More renewables and energy efficiency

## Renewable Energy Directive III: renewable energy for half of the EU's buildings needs

The Renewable Energy Directive (RED) is the key legislation supporting the roll-out of technologies using renewable energy sources <sup>6</sup>. Since its inception in 2018, following the adoption of the Paris Agreement, it has a clear objective of reducing the EU's reliance on fossil fuels. The 2023 recast of the Directive seeks to increase the current penetration of renewable energy in Europe. That is, from around 23% in 2023, to an overall binding target of at least 42.5% at the EU-level by 2030 –

aiming for 45% (Art. 3)  $^{7}$ . This target has been increased significantly from the previous 32%  $^{8}$ . As European buildings consume a substantial share of energy (around 16,000 PJ each year  $^{9}$ , approximately half of the EU's final energy consumption in 2022  $^{10}$ ), the recast Directive enshrines into law for the first time a buildings-specific target amounting to 49% of renewable energy in final energy consumption by 2030 (Art. 15a).

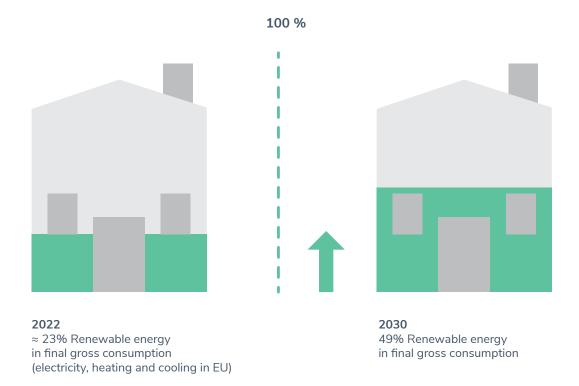


Figure 6: Renewable energy in buildings: estimated current and expected 2030

#### **Energy Efficiency Directive demands more efficient use of energy in buildings**

Energy efficiency is key to reducing the burden of energy bills on citizens and to do so the recast Energy Efficiency Directive (EED) sets new ambitious targets for energy demand reduction by 2030 <sup>11</sup>. To achieve these reductions, buildings will need to become increasingly more energy efficient, contributing to economy-wide yearly final energy consumption savings of at least

0.8%, 1.3%, 1.5% and 1.9% in 2021-2023, 2024-2025, 2026-2027, and 2028-2030, respectively, relative to 2016-2018 (Art. 8). Setting targets for the EU, the EED seeks to reduce both primary and final energy consumption across all sectors by introducing energy savings obligations alongside monitoring and reporting procedures.

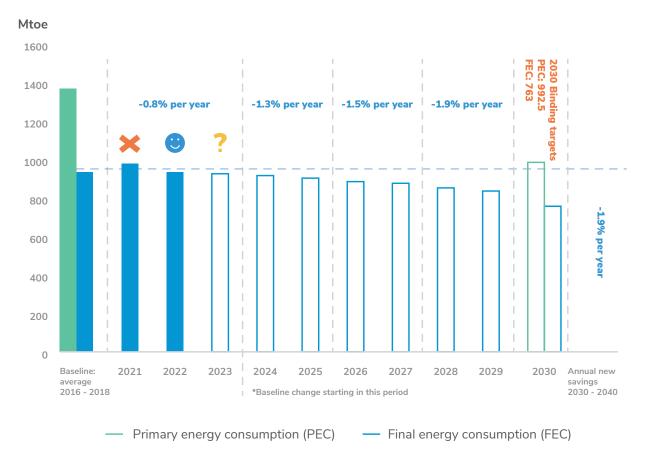


Figure 7: Energy reduction targets in the EED

## Decarbonising domestic heating systems: the Emissions Trading System 2 and the Social Climate Fund

The new Emissions Tradings System on heating and road transport (ETS2) is meant to reflect better the environmental cost of fossil fuels used in these sectors <sup>12 13</sup>. As fuel suppliers will add the ETS2 cost to their selling price,

the cost of fossil fuels will increase.

The ETS2 will become operational in 2027 and complement carbon pricing systmes in place in several Member States.

#### **EU Emissions Trading System (ETS)**

The EU's ETS is one of the largest carbon markets globally. It is based on a "cap and trade" principle, where the cap – reduced annually – is expressed in allowances. Each allowance gives installations the right to emit one tonne of CO2eq.

To support vulnerable households in making homes fossil-free and energy-efficient, the EU set up the Social Climate Fund (SCF), which will be fed with revenues from carbon pricing under the ETS2  $^{14}$ .





Figure 8: How do the ETS2 and the Social Climate Fund work?

# Environmental credentials of construction products: the Construction Products Regulation

The Construction Products Regulation (CPR) regulates how construction products are placed on the EU market<sup>15</sup>. It establishes rules (i.e., harmonised standards and European Assessment Documents (EADs) and Technical Assessments <sup>d</sup>) on how to express the performance of construction products regarding their function, safety, and environmental footprint. These characteristics must be documented in a declaration of performance and conformity (Art. 15). This is a pre-requisite for the CE marking (Art. 17), which certifies that products have been assessed to meet high safety, health, and environmental protection requirements.

In its revised form, the CPR mandates the disclosure of environmental impacts of construction products using Environmental Product Declarations (EPDs), requiring manufacturers to conduct a lifecycle assessment on an extensive range of environmental indicators (Annex II). This obligation will be gradually applied to products placed on the market. According to the timeline in Art. 15 (Figure 9) manufacturers will have to disclose lifecycle GWP as of 8 January 2026, adding nine more indicators as of 9 January 2030 and, eventually, all 16 indicators by 9 January 2032 – drafting a full EPD. The EPDs will be embedded into the declarations of performance and conformity <sup>16</sup>.

#### Declaration of performance and conformity (DoPC)



Environmental Products Declaration (EPD) 8 January 2026: climate change effects



**9 January 2030:** ozone depletion, acidification potential, eutrophication aquatic freshwater, eutrophication aquatic marine, eutrophication terrestrial, photochemical ozone, abiotic depletion, abiotic depletion (fossil fuels), water use



**9 January 2032:** particulate matter, ionizing radiation (human health), ecotoxicity (freshwater), human toxicity (cancer), human toxicity (non-cancer), landused related impacts



Figure 9: Environmental indicators in the declaration of performance and conformity

#### Milestones to 2050

Multiple targets are set on European buildings in the run-up to 2030 and the transformation of the building stock into a zero emissive one in 2050. With most pieces of legislation being Directives, Member States must act swiftly towards ambitious implementation at

national level. Civil society organisations will continue to play a key role in this, while also ensuring ambition at the EU-level.

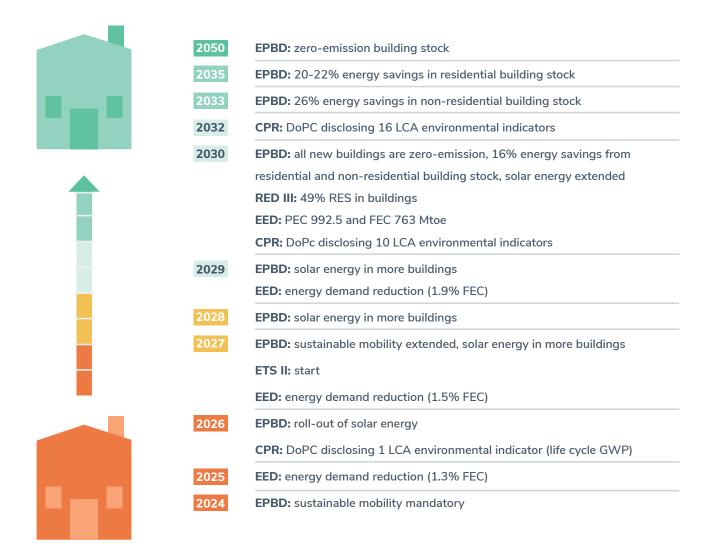


Figure 10: Milestones for European buildings in the run-up to a zero emitting stock

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We ensure the environmental voice is heard when they are developed and drive change by providing expertise to policymakers and industry players, leading to the implementation of strong environmental principles.

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